



# DATA PROTECTION POLICY

Draft Issue 2 (for approval)

## 1. Introduction

In delivering its charitable purpose, Chalford Band processes the personal data of its members, supporters, donors and the general public. This data is collected and used by the committee of the band and shall be handled in accordance with the General Data Protection Regulation (GDPR). Chalford Band's Data Protection Policy describes what personal data is collected, where it is stored, who can use it and how the rights of individuals are protected.

Individual band members may have collected and stored personal data, for example email addresses or phone numbers of band members, friends or other contacts which they use for their personal use, not directly associated with the management of the band. Such data is not the subject of this policy.

## 2. What personal data is collected

The band collects the following personal information; name, address, phone number(s), email address, IP address, date of birth, and emergency contact information.

In general, the band does not collect sensitive personal information as defined in the GDPR. This includes data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation. However, if the member (or their guardian if under 16) requests, health information specific to providing emergency support will be recorded.

## 3. Use of personal data

The personal data is collected and processed by members of the Chalford Band Committee and associated Sub-Committees for the purposes of operation of the band, for management of the band's activities, for fundraising, for marketing and for general communications.

The personal data shall be used in accordance with the permission to use the data given by individuals. The personal data shall not be used for any other purpose and shall not be provided to third parties, except that the data of band members may be shared with Brass Band Players Ltd. and other brass band contest organisations in order to comply with registration requirements for contests.

Personal data shall only be stored for the period for which it is required, for example for the duration of membership tenure. Data which is no longer required, or which is out of date shall be deleted.

#### **4. Where the personal data is stored and who has access to it**

Personal data is used by the members of the Chalford Band Committee and associated Sub-Committees. Chalford Band does not own any IT equipment for data processing. Personal data is stored on the personal computers of Committee Members and some personal data is also stored on shared cloud storage (such as Google Drive/MS OneDrive). Personal data which is collected from the band website, such as request for news updates is stored on the website server.

The following policies apply to the storage and sharing of this data.

1. Personal data stored on personal computers shall be protected by a login and password security mechanism. In the case where the personal computer is accessible to other parties, the individual files containing personal data should be password protected.
2. Personal data shall not be copied to, or transferred by, USB stick (or other portable storage) unless the files are password protected.
3. When using email address lists, for example to communicate to all band members, the blind copy (bcc) function should be used for individual email addresses, such that the distribution list is hidden from recipients.
4. Personal data held on cloud storage shall be password protected and accessible only to authorised committee members. Access permission is controlled by the band's IT administrator.
5. Personal data held on the website server shall be password protected and accessible only to authorised committee members. Access permission is controlled by the band's IT administrator.
6. Personal data which is held on paper records shall be stored in a safe location, for example at the committee member's home. Where personal data is carried outside of this location, to a band rehearsal, event, or contest, the personal data must be considered as confidential and kept in the committee member's possession at all times.
7. When committee members cease to serve on the committee, any personal data they hold shall be deleted.
8. Personal data may be shared with other committee members for the purposes of management of the band.

#### **5. Permission to use the data**

Prior to collecting personal data, permission shall be obtained from each individual to store their data and to contact them. Such permission may be gained by use of the membership form, or other means. This is an opt-in process, permission should not be assumed.

#### **6. Rights of individuals**

Individuals have the right to see what personal data has been stored. When a request to see personal data is received, one committee member will coordinate the response and will ask all other committee members to provide their relevant stored data for collection into a single response to the request.



Individuals have the right for their personal data to be removed from use by the band and for their history to be deleted. When a request for removal of personal data and/or history is received, one committee member will coordinate the response and ask each committee member to delete the relevant data. The individual concerned will be notified that their personal data and/or history have been deleted.

Individuals have the right to ask for their personal data to be changed. When a request to change personal data is received, one committee member will coordinate the response and will ask all other committee members to change the relevant stored data. The individual concerned will be notified that their personal data has been changed.

## **7. Registration with the Information Commissioners Office**

Chalford Band is a not-for-profit organisation which only processes information necessary to provide or administer activities for people who are members of the organisation or who have regular contact with it. The band qualifies for exemption from the registration requirements with the information commissioner's office (ICO).

## **8. Maintenance, audit and review**

An initial audit has been carried out to identify what personal data is being held and for what purpose. Such an audit may be repeated from time to time.

It is the responsibility of individual committee members to maintain accurate data, and to delete data which is no longer required.

The committee will review this policy every two years.

## **9. Document History**

6<sup>th</sup> June 2018

Policy drafted and circulated for initial review

12<sup>th</sup> June 2018

2nd version circulated for approval



## Chalford Band Members Privacy Notice under the General Data Protection Regulation

This document details what personal data is collected from you and how it is used for the purposes of your membership of Chalford Band.

Please indicate your understanding and agreement with each section by ticking the relevant box and signing and dating at the end.

Name of Band Member:

- I give permission to use my name, address, phone number(s), email address and other personal data that I may provide for the purposes of membership of Chalford Band. This personal data is used for communications concerning the band activities, collection of subscriptions, contest registration, event management and travel management.
- I understand that such data is used by officers of the band and is stored by individuals on paper, personal computers and cloud services; these individuals act following good personal practice for security of such data.
- Personal data may be shared with Brass Band Players, Gloucestershire Brass Band Association, West of England Brass Band Association, other brass band contest organisations and the relevant County Child Performance Registers.
- I do NOT give permission to share or give this data to any 3<sup>rd</sup> parties other than those listed above.
- By informing a member of the Band Committee I can:
  - request information about what personal data is held about me, and where, at any time, and have a response within 30 days.
  - withdraw consent at any time and have all my data deleted and removed within 30 days except for such data legally to be retained for reporting and regulatory purposes e.g. tax.
- I understand that withdrawing my consent may mean that the band can no longer contact me and that my band membership may be terminated.
- I may lodge a complaint at any time with the Information Commissioner's Office if I believe there is non-compliance of this Policy.

Signed:

Date:

Parent/Guardian Name (if member is under 16):

Signed:

Date: